

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

TYRONE A. BLACKBURN,
Plaintiff,

-against

ALAN FELDMAN
ABC LEGAL SERVICES, Inc.,
CAVALRY SPV I, LLC
As ASSIGNEE OF Citibank, N.A.,
MANDARICH LAW GROUP LLP

Defendants,

COMPLAINT

Civil Action No. 1:23-cv-02380

**NOTICE OF VOLUNTARY DISMISSAL
WITH PREJUDICE**

According to 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Pro-se Plaintiff, Tyrone Blackburn ("Plaintiff"), hereby gives notice that Plaintiff voluntarily dismisses his claims against **ALL** Defendants **WITH PREJUDICE**. On June 30, 2023, the parties have agreed in principle to settle this matter. A settlement agreement was circulated, and Plaintiff will sign and notarize the agreement on July 1, 2023. In good faith, Plaintiff has agreed to voluntarily dismiss his claims against all defendants with prejudice on June 30, 2023, instead of filing an amended complaint. Plaintiff is doing so with the understanding that as of the date of the voluntary dismissal, the settlement agreement has yet to be fully executed by all parties. Plaintiff has informed the parties that he reserves his right to reinstate this case against all defendants if any defendant fails to sign the settlement agreement.

Dated: June 30, 2023

By: Tyrone A. Blackburn, Esq.
Tyrone Blackburn